

possession and uses said property. On January 25, 1960, made application for Special Warrant by going to Land Office in Annapolis, Maryland and paid for said Warrant. Special Warrant issued under the Seal of the Office, 26 day of February 1960.

Further when Dr. Thomas E. R. Miller died intestate their is no Deed on record from administration of his estate showing his wife Margaret Elizabeth Delaplaine Miller had assumed title to the said tract of land and therefore fee-simple title to the said property has not been conveyed as alledged in Paragraph 2 (c). Defendant further denies the allegation set forth in Paragraph 2 (d) and further explains that as these Deeds were never picked up in lineal succession and therefore Complainant could not convey full and complete title of property to Dorothy Keys as shown in "Exhibit C." Further Complainant could not have under any consideration 20 years possession because 7 years had elapsed since the death of his Mother Mamie D. Palmer.

3. Defendant denies allegation as set forth in Paragraph 3 and further explains that Ruth Bowie maintained possession and occupancy of house and property for a period of more than 70 years, 1881-1951, unbroken and unmolested.

4. Defendant avers in Paragraph 4 to the allegation that Defendant entered negotiations to purchase said tract from Complainants and denies he was a trespasser as at the time alleged and further explains that on entering negotiations to buy, Complainants stated they were in possession of a good and marketable Deed and for the sum of \$2250.00 they would convey said property with a General Warranty Deed. The Complainants gave to the Defendant permission to have the property rezoned and to use the property as the Defendant wished, while the transfer of the Deed was being consummated. The Defendant proceeded to have the property rezoned at great expenditure of time and money. Then on February 26, 1959, the Complainant offered to execute a Deed using "Exhibit C and D" as a titled reference and not warranting any condition. As Complainant stated he could not find any recorded Deed on record or a Deed of any kind for the property. The Defendant refused to accept the Deed and was told if Defendant wanted the title cleared to do it himself. After waiting 9 months for Complainant to furnish promised Warranty Deed the Defendant secured Special Warrant from the Land Office in Annapolis and then Defendant took possession of said land in order to force the Complainants to produce good title.